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HONORABLE CHRISTOPHER M. ALSTON

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

B-1208 PINE, LLC,

Debtor.

Chapter 11

Case No. 24-10088-CMA

**OBJECTION TO CLAIM NO. 12 OF
RAYMOND CHENG & BIWRAN DENG,
NOTICE OF HEARING AND
CERTIFICATE OF MAILING**

TO: RAYMOND CHENG & BIWRAN DENG
AND TO: THE CLERK OF THE COURT
AND TO: THE HONORABLE CHRISTOPHER M. ALSTON
RESPONSE DUE: THURSDAY, DECEMBER 26, 2024
HEARING DATE: THURSDAY, JANUARY 2, 2025
HEARING TIME: 9:30 A.M. PACIFIC TIME
LOCATION: Seattle Federal Courthouse
Courtroom 7206, 7th Floor
700 Stewart Street
Seattle, Washington 98101

NOTICE IS HEREBY GIVEN that the undersigned has filed an Objection to your claim in the above-captioned Chapter 11 bankruptcy case, as detailed below.

Your rights may be affected. Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

PLEASE TAKE FURTHER NOTICE THAT if you do not want the Court to reduce, modify or eliminate your claim, then you or your attorney must file with the Court **on or before December 26, 2024**, a written response to the objection, explaining your position. If your written response is mailed to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above; mail to the following address:

OBJECTION TO CLAIM NO. 12 OF RAYMOND CHENG &
BIWRAN DENG, NOTICE OF HEARING AND CERTIFICATE
OF MAILING – Page 1

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1 4. On the Claims Bar Date, Claimants filed Proof of Claim No. 12 (the “Proof of Claim,”
2 and the asserted claim evidenced thereby, the “Claim”) with the Court in the Chapter 11 Case. *See*
3 Proof of Claim No. 12.

4 5. Claimants assert they hold an unsecured claim against the Debtor in the amount of
5 \$1,417,329.10 (the “Claim Amount”) arising from “[f]raud claims and joint and several liability for
6 those claims,” which are purportedly evidenced by a *Complaint* (the “Complaint”) for an action
7 pending in King County Superior Court. *Id.*

8 6. The Debtor objects to Claim No. 12 of Claimants Raymond Cheng and Biwran Deng
9 on the basis that the Proof of Claim, Complaint, and other supporting documentation fail to evidence
10 any claim against the Debtor but, rather, purport to evidence claims against third party non-debtors
11 Pine Esker, LLC, Vibrant Cities LLC, James Wong, Tyra Wong, Ming Fung, and Pui Leung
12 (collectively, the “Defendants,” and each, a “Defendant”). No Defendant is a debtor in this Chapter
13 11 Case. *See* Fed. R. Bankr. P. 3001(c). Absent submission of any supporting documentation
14 evidencing a claim against the Debtor, the Claim should be disallowed in its entirety.

15 7. This Objection is limited to the grounds stated herein. The Debtor expressly reserves
16 all further substantive or procedural objections. Nothing contained herein or any actions taken
17 pursuant to such relief is intended or should be construed as: (a) an admission as to the validity of any
18 claim against the Debtor; (b) a waiver of the Debtor’s right to dispute any claim on any grounds; (c) a
19 promise or requirement to pay any claim; (d) an implication or admission that any particular claim is
20 of a type specified in this Objection; or (e) a waiver of the Debtor’s rights under the Bankruptcy Code
21 or any other applicable law.

22 IF YOU OR YOUR ATTORNEY DO NOT TAKE THE STEPS SET FORTH ABOVE, THE
23 COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE OBJECTION TO YOUR CLAIM.

OBJECTION TO CLAIM NO. 12 OF RAYMOND CHENG &
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1 DATED this 26th day of November, 2024.

2 BUSH KORNFELD LLP

3 By /s/ Richard B. Keeton

4 James L. Day, WSBA #20474

5 Richard B. Keeton, WSBA #51537

6 Attorneys for the Debtor

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OBJECTION TO CLAIM NO. 12 OF RAYMOND CHENG &
BIWRAN DENG, NOTICE OF HEARING AND CERTIFICATE
OF MAILING – Page 4

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1 **CERTIFICATE OF MAILING**

2 I certify that on this 26th day of November, 2024, at Seattle, Washington, I caused copies of the
3 *Objection to Claim No. 12 of Raymond Cheng & Biwran Deng, Notice of Hearing and Certificate of*
4 *Mailing* to be mailed by U.S. First Class Mail, postage pre-paid to:

5 Fennemore Craig, P.C.
6 Attn: Brandi B. Balanda
7 1425 Fourth Ave., Suite 800
8 Seattle, WA 98101

9 and emailed to: bbalanda@fennemorelaw.com.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 /s/ Eric Yocom
12 Eric Yocom
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